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May 7, 2021

**BY: ECF**

Honorable James L. Cott  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Kaye v. NYC Health & Hospitals Corp. et al.*, 18-cv-12137 (JPC)(JLC)

Dear Judge Magistrate Judge Cott:

I write to respond to Plaintiff's May 6, 2021 letter to the Court accusing Defendants' of failing to comply with Your Honor's April 27, 2021 Order. *See* ECF 148. On May 4, 2021, Defendants provided Dr. Winkler's complete salary information from his employer, Physician Affiliate Group of New York, P.C. ("PAGNY"), to Plaintiff. Contrary to Plaintiff assertions, Dr. Winkler is not also employed by H+H.

Defendants also certified in writing on May 4, 2021, that all relevant, non-privileged emails for the custodians identified have been provided to Plaintiff, pursuant to a reasonably diligent search. Defendants, therefore, do not believe Court intervention is necessary.

Finally, of the dates provided by Plaintiff for a settlement conference before Your Honor, Defendants are available on May 25, 2021.

Respectfully submitted,

**ECF /s/**

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cc: Special Hagan (by ECF)